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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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1 **PROPOUNDING PARTY:** Plaintiffs Karla Gonzalez and Jaime Retiguin
2 Barba, Sr.

3 **RESPONDING PARTY:** Defendant Allied Collection Services, Inc.

4 **SET NO:** Two

5 Plaintiffs Karla Gonzalez and Jaime Retiguin Barba, Sr. (individually
6 "Plaintiff Gonzalez" and "Plaintiff Barba" and collectively "Plaintiffs"), by and
7 through counsel, hereby request that Defendant Allied Collection Services, Inc.
8 (hereinafter "Defendant") answer within the statutory time-limit, separately and
9 fully in keeping with all Defendant's obligations under FRCP 33, the following
10 interrogatories.

11

12 **DEFINITIONS AND INSTRUCTIONS**

13 **I. DEFINITIONS:**

14 As used in these Interrogatories, the words and terms set forth below are
15 defined as follows:

16 A. "You" or "your" means the party separately answering these Interrogatories,
17 together with its wholly or partly owned subsidiaries, and its affiliates or parent
18 companies, and each and every other legal entity within its direct or indirect
19 control or in which it holds any equity or other interests, as well as its merged
20 or acquired predecessors in interest (if any), its present and former officers,
21 directors, employees, agents, representatives, and any other persons or
22 corporations acting in a consulting or advisory capacity or acting or purporting
23 to act on behalf of any of the foregoing. "You" includes your company, entity,
24 institution, agency, subsidiary or subsidiaries, parent corporation(s) and/or any
25 of its branches, departments, employees, agents, contractual affiliates, or
26 otherwise connected by legal relationship, in the broadest sense. You may also
27 be referenced herein simply as "Defendant."

1 B. Whenever relevant, words in singular shall include the plural thereof. Whenever
2 relevant, the use of one gender includes all others, appropriate in the context.
3 C. The word "complaint," unless otherwise noted, means the original Complaints
4 filed in this case and any amended Complaint served by Plaintiff in this action.
5 D. The term "Document" means any writing or recording as defined in Rule 1001
6 of the Federal Rules of Evidence, including any drafts, revisions and computer-
7 readable materials. "Document" shall also mean electronic mail, tapes, disks,
8 diskettes, data cells, tape backups, drums, printouts, and all other data
9 compilations from which information can be obtained (translated, if necessary,
10 by Defendant through detection devices into usable form).
11 E. The word "Plaintiff" refers to the plaintiff in this case.
12 F. "Audit Trail" means a complete, detailed listing of each and every alteration,
13 deletion, inquiry into, modification or other change to the credit report or
14 profile as maintained in recorded form, in the broadest sense, by "you." The
15 listing should include the identity, address, employer and title of the person(s)
16 taking the action, the identity, address, employer and title of the person(s)
17 authorizing the action, a detailed explanation of the action taken, the date of the
18 action, the means used to effect such action, the location of origin of the action
19 and the reason the action was taken. The term "audit trail" also includes the
20 definition provided for the phrase in the FederBush, Federal Trade Commission
21 and Formal Staff Opinion Letter, March 10, 1983.

22

23 **II. INSTRUCTIONS**

24 A. The information requested is for all information known to Defendant, its
25 officers, directors, and employees and available at the time of answering,
26 including information in the possession of its agents.
27 B. To the extent any information called for by these Interrogatories is unknown, so
28 state, and set forth such remaining information as is known. If any estimate or

1 general description can reasonably be made in place of unknown information,
2 set forth the best estimate or general description, clearly designating the answer
3 as such, in place of unknown information, and the basis upon which the
4 estimate or general description is made.

5 C. To the extent any Interrogatory is objected to, set forth all reasons therefore. If
6 any claim of privilege is asserted as a ground for not answering any
7 Interrogatory, whether in whole or in part, describe the factual basis for such
8 claim in sufficient detail so as to permit the court to adjudicate the validity of
9 the claim.

10 D. These Interrogatories shall be deemed continuing, so as to require additional
11 answers if further information is obtained between the time responses are
12 served and the time of trial. Such additional responses shall be served from time
13 to time, but not later than thirty (30) days after such additional information is
14 received.

15

16 **INTERROGATORIES**

17 1. Did you access either of Plaintiffs' credit reports after this case was filed?
18 2. Please state every date that you accessed Plaintiffs' credit reports.
19 3. Provide a running balance of the Macintyre account from when you started
20 collecting on that account until present.
21 4. Provide a running balance of the Fisher account from when you started
22 collecting on that account until present.

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1 5. Provide a running balance of the Mendoza account from when you started
2 collecting on that account until present.
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DATED this 23rd day of March 2018.

5 **KAZEROUNI LAW GROUP, APC**
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8 By: /s/ Michael Kind
9 Michael Kind, Esq.
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11 Las Vegas, NV 89148
12 *Attorneys for Plaintiff*
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